

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of

Performance Measurements and Standards for  
Unbundled Network Elements and Interconnection

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CC Docket No. 01-318

**COMMENTS IN SUPPORT OF THE  
MOTION FOR EXTENSION OF TIME FILED BY THE  
UNITED STATES TELECOM ASSOCIATION**

The Competitive Telecommunications Association (“CompTel”),<sup>1</sup> files this brief comments in support of the Motion for Extension of Time filed on December 3, 2001 by the United States Telecom Association (“USTA”) in the above-captioned proceeding. CompTel hereby requests that the Federal Communications Commission (“FCC”) extend the time for filing comments and reply comments in response to the *Notice of Proposed Rulemaking* (“*NPRM*”) in the above-captioned proceeding.<sup>2</sup> Specifically, the CompTel supports the request of USTA that the FCC extend the date for comments from December 31, 2001 to January 31, 2002, and the date for reply comments from January 22, 2002 to February 22, 2002. CompTel believes that a modest extension of the comment and reply comment deadlines would enable interested parties to provide more substantive and complete comments on the complex issues raised in the *NPRM*. Therefore, granting an extension of the comment and reply comment deadlines would enhance the overall quality of the comments and reply comments, and would provide a more complete record for consideration.

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<sup>1</sup> Founded in 1981, CompTel is the leading national association representing U.S. and international competitive communications firms and their suppliers, who offer a variety of local, long distance, international, Internet and wireless services.

<sup>2</sup> *Performance Measurements and Standards for Unbundled Network Elements and Interconnection*, Notice of Proposed Rulemaking, CC Docket No. 01-318 (rel. Nov. 19, 2001) (“*NPRM*”).

In the *NPRM*, the FCC requested comment on how to effectively measure, and ensure nondiscrimination in, the performance of incumbent LECs in providing unbundled network elements. The OSS functions and metrics on which the Commission has requested comment, and other relevant measures which the Commission will need to consider, will necessitate a great deal of inter-company coordination between operations, engineering, provisioning, and policy experts in order for carriers to provide the Commission with the most useful information. The upcoming holiday season will, no doubt, exacerbate and frustrate an undertaking that will already be complicated by the necessary dispersion of expertise at both competitive and incumbent carriers. Due to the complexity of the issues raised in the *NPRM*, an extension of time is necessary to enhance the overall quality of the comments and reply comments and provide a more complete record for consideration.

### CONCLUSION

For the foregoing reasons, CompTel respectfully requests the FCC grant the Motion of USTA to extend the date for comments from December 31, 2001 to January 31, 2002, and the date for reply comments from January 22, 2002 to February 22, 2002.

Respectfully submitted,



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